

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

Case No. 2:22-cv-00642-JPS

PREPARED FOOD PHOTOS, INC. f/k/a  
ADLIFE MARKETING &  
COMMUNICATIONS CO., INC.,

Plaintiff,

v.

NOFAL LLC d/b/a FOOD TOWN MART and  
SHARIF JABER,

Defendants.

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**PLAINTIFF'S RESPONSE TO MOTION TO WITHDRAW AS COUNSEL**

Plaintiff Prepared Food Photos, Inc. f/k/a Adlife Marketing & Communications Co., Inc. (“Plaintiff”) hereby files this response to the May 1, 2025 Motion to Withdraw as Counsel for the Defendants (the “Motion to Withdraw”) [D.E. 65], and states as follows:

1. Plaintiff does not oppose Mr. Steinle or the law firm of Terschan, Steinle, Hodan & Ganzer, Ltd.’s request to withdraw as counsel for defendants Nofal LLC d/b/a Food Town Mart (“Nofal LLC”) and Sharif Jaber (“Jaber”) (collectively, the “Defendants”).

2. Plaintiff is, however, concerned with delays that may be caused in disposition of the pending motion for attorneys’ fees [D.E. 64] as Nofal LLC may not be represented in this action without an attorney. See 1756 W. Lake St. LLC v. Am. Chtd. Bank, 787 F.3d 383, 385 (7th Cir. 2015) (“[A] limited liability company, like a corporation, cannot litigate pro se or be represented in the litigation by a nonlawyer.”).

3. Plaintiff therefore requests that the Court provide Nofal LLC a reasonable amount

of time (no more than 21 days) for new counsel to enter its appearance and extend the date for Nofal LLC to file a response (if any) to the motion for attorneys' fees to a date approximately 7 – 10 days thereafter.

4. This will excuse Defendants' current counsel from being forced to respond to a motion without the benefit of communications with (or payment from) his clients while simultaneously protecting Nofal LLC's right (if it so chooses) to respond to the motion for fees through replacement counsel.

5. Plaintiff also requests that, before being allowed to withdraw, Defendants' current counsel provide the Court and undersigned counsel with all known contact information for Defendants.

Respectfully submitted,

Dated: May 3, 2025.

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By: /s/ Daniel DeSouza  
Daniel DeSouza, Esq.  
Florida Bar No. 19291

### **CERTIFICATE OF SERVICE**

I hereby certify that on May 3, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will electronically serve all counsel of record.

By: /s/ Daniel DeSouza  
Daniel DeSouza, Esq.